ENVIRONMENTAL PROTECTION AGENCY
REGION I

DATE: October 30, 1984

SUBJ: October 22, 1984 RCRA Inspection Carroll ~~Products, Inc.~~

FROM: Steve Fradkoff, Engineer SBF
Compliance Monitoring & Enforcement Section

TO: File

On Monday, October 22, 1984 Gerri Falco and I conducted a RCRA follow-up inspection at Carroll Products, Inc., Wood River Junction, R.I. The purpose of the inspection was to confirm actions claimed to be taken by Carroll Products to achieve compliance with the September 4, 1984 Administrative Compliance Order.

We toured the facility grounds with Arthur Schwartz, Director of Chemical Operations and Philip Fahlman, Plant Superintendent.

Findings:

1. Talb Industries and Mitchell Manufacturing Corp. are no longer in operatioin at the site. The equipment and processes were purchased by ICI on October 5, 1984.

2. Carroll Products has discontinued production of diazochloride. Carroll Products will continue to manufacture blends of iron oxide pigment and may use the remaining portion of the site for raw chemical and product storage.

3. All hazardous wastes previously observed on site have been analyzed, considered hazardous, and properly disposed of.

4. Most of the process equipment has been or is being dismantled for shipment to ICI.

5. The diazochloride waste tank in the process building and four (4) storage tanks located in the southwest corner of the facility were empty and clean. The diazochloride and two (2) of the storage tanks, which previously contained a white residue, had a two foot by two foot hole cut in their sides and cannot be used in their present condition. Mr. Schwartz indicated that the tanks will not be used in the future and have been decommissioned.

6. The steel plate in the floor of the Quonset hut, previously used to store wastes, had been sealed and could not be examined to determine if there was a concrete box under the plate. Mr. Schwartz informed us that under the plate is a hydraulic system which would raise the plate up to the tailgate of trucks so that a forklift could be driven up the plate into the truck.

7. Carroll Products is closing their laboratory. A contractor was hired to prepare lab packs for disposal. 40 to 50 drums of lab packs should be shipped off site prior to October 26, 1984. 37 lab packs were already prepared and properly stored with adequate aisle space in Building 14. All drums were properly marked, labelled, and dated. A secondary containment berm had been poured around the concrete storage area floor in Building 14. In addition to the 37 lab packs in the building, there were six cardboard containers of flammable solids (2 24-gallon and 4 41-gallon). Mr. Schwartz said that the cardboard containers meet DOT requirements for the material stored in them. There were also 22 5-gallon pails of mixed products which are now considered waste and will be disposed of with the lab packs. All the additional containers were properly stored and marked.

8. Mr. Schwartz was informed that a weekly inspection of the waste now in storage is required and the RIDEM will require use of an inspection log to document the inspections. Since wastes have only been stored for six days, an inspection was not yet required.

9. There are between 300 and 500 drums of various products left on site. Most are in Building 4, some in Building 9 and small amounts in other buildings. Most of the products now belong to ICI. Mr. Schwartz said that he told ICI to take what they want. Whatever is left over Carroll Products will try to sell or dispose of as a waste. Mr. Schwartz expects to know the disposition of all product drums within 60 days.

10. As previously indicated in Tom Michel's memo of October 9, 1984, Carroll Products' contingency plan needs to be revised. RI DEM has reviewed the latest draft and has sent a letter to Carroll Products outlining what revisions are necessary. Tom's memo also questioned Mr. Fahlman's training in hazardous waste. A submittal by Carroll Products' attorney dated October 5, 1984 supplies information concerning Mr. Fahlman's training.

11. Mr. Schwartz indicated that when all hazardous waste and stored raw products are removed from the site Carroll Products will no longer be a large quantity generator of hazardous waste.

Conclusion

1. Carroll Products has complied with the September 4, 1984 Order with the exception of revision of the contingency plan and possibly the training plan, if the October 5, 1984 information is not adequate.

2. Inspections of waste storage areas must be conducted weekly whenever waste is stored on site and a log of the inspections should be kept.

3. It should be determined as quickly as possible which product drums will be used by ICI, which will be sold and which will be disposed of.

OCT 26 1984

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
75 Davis Street - 204 Cannon Building
Providence, R.I. 02908

18 October 1984

Mr. Philip A. Fahlman
Carroll Products Inc.
Route 91
Wood River Junction, RI 02894

Dear Mr. Fahlman:

I have reviewed your revised contingency and training plans which you submitted 17 September 1984. You have addressed some of the points outlined in my initial review letter of 2 August 1984; however, the plan remains deficient in the following areas:

1. The contingency plan must describe the procedures facility personnel will take in response to a spill, fire, etc. involving hazardous wastes (40 CFR 265.52 (a)).

2. The contingency plan will not be complete until an outline of the arrangements you have made with local emergency authorities is included. At a minimum, local authorities should be made aware of the following (40 CFR 265.52 (c) and 265.37):

   a. Layout of the facility;
   b. Properties and hazards associated with the waste materials;
   c. Possible evacuation routes;
   d. Places where facility personnel would normally be working.

3. Page 1, 265.4 should read 265.54.

4. Page 2 - In the event of any spill of hazardous material, the Rhode Island Department of Environmental Management must be notified immediately (Rule 5.10 RI Hazardous Waste Rules and Regulations). I suggest a copy of the written report required under 40 CFR 265.56 (j) be submitted to DEM as well as the Regional Administrator.

5. The floor plan you included in the contingency plan you submitted 20 September 1983 was not part of the plan I received 17 September 1984. I believe this floor plan is an important part of the plan and should be included.

6. Page 2 Item No. 7 - The plan must outline the details to be addressed during a clean-up operation.

I believe these corrections can be completed by 16 November 1984.

If you have any questions, please contact me at 277-2797.

Very truly yours,

Alicia M. Good

Alicia M. Good, Engineer
Division of Air and Hazardous Materials

AMG:tg
cc: Tom Michel, EPA ✓

Site ID # RID002042206

Part A Application Yes ___ No ___

RCRA INSPECTION CHECKLIST

Site Name: Carroll Products

Site Location: Route 91
Wood River Junction RI 02894

Phone No: (401) 364-7731

Inspectors:

EPA: S Fradkoff, G Falco

State: —

Industry: ___

Inspection Date: 10/22/84

Type of Facility: ___

Generator: ✓

Transporter: NO

TSD: NO

Permits Issued: ___

In Compliance Yes ~~No~~ ✓

I. Generator with Temp. Storage or TSD Facility

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.)

Talh and mutual mfg no longer in operation at site purchased by (ICI) as of (Oct 5 1984). Carrol products diazoch loride discontinued at site. Only iron oxide mixture produced on site. Site may be used as chem warehouse.

NL 9 ICI to take some raw products
~ 150 drum + Containers

Bryldins 4-1 Raw mutrial for ICI
~ over 150 drums different sizes

2. Hazardous Waste Profile

Type of Waste	Amt. of Waste kg/mo	Onsite Temp. Storage/ TSD	Transporter	Offsite TSD
Lab packs	40→50 drums	completed by 10/26 closing lab		
Product chemicals that can't be sold.	~ 300-500 drums			

3. Records

262.21 a.) Manifest — Manifests may be checked ahead of time by state personnel who have them on file - otherwise, random selection of sc during inspection for review. Must be kept for 3 years.

1) Document No.: RI 1216 1 and RI 1216 2

2) Generator ID, name, address: Cavro 1

3) Transporter(s) ID, name, address: NJD071629976 STS East Millbrook Woodstown NJ

4) TSD Facility ID, name, address: Rollins Env. Bridgeport NJ NJD058288239

5) Waste Type of Quantity: Waste Flam. Solid NOS 32 drm. waste methylene chloride 6 drm.

6) Date of Acceptance: 8/24/84 Arrived Facility 9/28/84

262.50 i) International Shipping Manifest:

262.42 ii) Exception Report: NO

265.13 b.) Waste Analysis Plan

1. Plan on site: NO

2. Plan should include (a) parameters: _____

(b) test methods: _____

(c) sampling method: _____

(d) frequency: _____

3. Copy of Results: Yes (Rip Sampling)

265.15 c.) Inspection Schedule and log

1) Are inspections conducted: not weekly - wastes just generated last week (lab packs)

2) Written inspection schedule: NO

3) Inspection Log: NO

(A) Daily - loading and unloading of areas subject to spills: _____
- discharge control equipment in tanks: _____
- incinerator system, thermal treatment equilpment, _____
- chem/phys/biol treatment equipment: _____
- freeboard level of surface impoundments: _____

(B) *Weekly - physical conditions of containers: _____
- " tanks: _____
- " surface impoundments: _____
- " chem/phys/bio. treatment facility: _____

265.16 *d.) Personnel Training Records

1.) Job titles/position descriptions and name of employee

✓

2.) Description of training: ✓

3.) Records of Training: ✓

4.) Training completed: ✓

* Required for Temporary Storage

*e.) Contingency Plan

265.53 1. Plan on site: ✓

265.53 2. Plan to local authorities: ✓

265.52 3. Content of Plan:

a) Emergency plan: weak

b) Local authority arrangements: weak

c) Identify emergency coordinator: ✓

d) List of emergency equipment: ✓

e) Evaciation plans: ✓

f.) Closure and Post-closure Plans; Cost Estimates

265.112, .113, .114, .115 1. Closure Plan (TSD Facilities) - No

a) Plan on site:

b) Does plan include:

1) Schedule of partial closure if applicable:

2) Estimate of maximum inventory of waste in storag treatment at given time:

3) Schedule for final closure & an estimate of the year of closure:

4) Description of steps needed to decontaminate fac equipment:

5) Total time required for closure:

6) Certification of closure:

265.117, .118 2. Post-closure Plan (disposal facilities only)

a) Plan on site:

b) Does plan identify and include frequency of:

o planned ground water monitoring:
o planned maintenance & security activities:
o name, address and phone number of Post-closure co

c) Length of Post-closure period identified:

* Required for Temporary Storage

265.142 3. Closure Cost Estimate (TSD facilities)

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Closure Plan changed?

d) If answer to 3 is yes, has cost estimate changed?

265.144 4. Post-closure Cost Estimate (disposal facilities only)

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Post-closure plan changed?

d) If answer to 3 is yes, has cost estimate changed?

265.73 c) Operating Records

1. Records on site _____

2. Description, quantity, method and dates of disposal: _____

_____

3. Location onsite and manifest number: _____

_____

4. Results of waste analysis: _____

5. Record of any incidents requiring use of contingency plan: _____

_____

6. Records and results of inspections: _____

7. Closure and post-closure cost estimates if needed: _____

B. Inspection

265.14 1. Site Security

a) 24 hour surveillance system: weekend + Second Shift.

b) or Artificial or natural barrier: Yes

c) and Means to control entry: Yes

d) Danger sign posted at each entrance legible at 25': Yes

265.30-.37 **2. Site Preparedness/Prevention

next building ≈ 150' away Telephone →

a) Internal communication/alarm: No

b) Telephone/2-way radio: No

c) Portable fire control equipment: Yes

d) Adequate water for fire control: Yes

e) Testing and Maintenance of equipment: Yes

f) Adequate aisle spare:

g) Access to equipment:

265,170-.177 3. Containers

4 Tanks 2' holes cut in ends of 2 salt rust ~~Rust-salt~~ hole cut in diazo Bilking tank

Leaks no

Ruptures no

Corrosion no

Closed Except in use Yes

Heat/Pressure

50' bufferzone for I and R wastes:

I = Ignitable ✓ R = Reactive

37 lab packs (33-1) 2 Sawdust from spills 24 cardpack 6 waste cardboard flamesolid (2-24 4 41 gal) ≈ 5 gal mixed product wastes

No smoking signs near I or R waste ✓

Separation of incompatible wastes ✓

Evidence of spills no

262.30-.34 Pretransport requirements: packaging ✓

labelling ✓

marking ✓

placarding

Date of Waste Accumulation ✓

*NYR Check for impermeable base under containers, any drains, secondary containment

*NYR - Not yet regulated

**Required for Temporary Storage

265.190-.199 4. Tanks

Leaks No longer used

Ruptures

Corrosion: Check valves, piping controls for signs of corrosion

≥ 2' freeboard or containment

Heat/pressure

Evidence of spills

Inflow and outflow controls

Continuous Inflow Means to stop flow?

Special Requirements for I and R wastes

265.220-.230 5. Surface Impoundments (Pits, Ponds and lagoons)

Protective Cover on Dikes

≥ 2' freeboard

Special requirements for I and R waste

Evidence of fire, explosion - leak

*NYR Liner

265.90-.94 **Groundwater Monitoring

265.250-.257 6. Waste Piles

Wind erosion control

**Prevention of leachate from pile (if hazardous)

Special requirements for I and R waste

Evidence of fire, explosion, leak

Separation of incompatible wastes

Waste analysis

*NYR - Not yet regulated

**November 19, 1981

265.340
265.382

7. Incinerators/Thermal Treatment

a) Steady State conditions _____

b) Inspect combustion and emission control instruments every 15 minutes _____

c) Observe stack plume hourly _____

d) Waste analysis:

1) Heating value of waste _____

2) Organic halogen content _____

3) Sulfur content _____

4) Lead concentrations _____

5) Mercury concentrations _____

e) Evidence of leaks of spills (pumps, valves, conveyors and pipes) _____

f) Daily Inspection of Emergency shutdown controls and Alarm systems _____

g) Special Requirements for incompatible wastes _____

265.272 - 265.282

8. Phys/Chem/Bio. Treatment

a) Leaks _____

b) Ruptures _____

c) Corrosion _____

d) Waste cut off _____

e) Waste analysis _____

f) Special Requirements for I and R waste _____

g) Special Requirements for incompatible wastes _____

265.272 - 265.282 9. Land Treatment

a) Approval document _____

*b) Run-on diversion _____

*c) Run-off collection; Treat if necessary _____

d) Waste Analysis _____

e) Presence of food chain crops, if so, refer to 265.276 ____

f) Unsaturated zone monitoring plan _____

g) Unsaturated zone waste analysis _____

h) Records of application dates, rates, quantities and location of waste _____

i) Special requirements for I and R wastes _____

j) Special requirements for incompatible wastes _____

265.90-.94 *k) Groundwater Monitoring _____

265.302-.315 10. Landfills

*a) Run-on diversion _____

*b) Run-off collection; Treat if necessary _____

c) Wind dispersion controlled _____

d) Records of all dimensions, locations, and contents _____

e) Special Requirements for I and R wastes _____

f) Special Requirements for Incompatible Wastes _____

*g) Special Requirements for liquids _____

*h) Reduction in volume of empty containers _____

265.90-.94 *i) Groundwater Monitoring _____

Subpart R 11. Underground Injection

Consult appropriate subparts.

C. Requests for Information

D. Photos Taken

E. Sampling Inspection Needed

F. Potential for Imminent Hazard, Air, or Water Discharge Violations

G. Proximity to Residential Area, Surface Water, Recharge Zone, etc.